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LAKE OF THE WOODS COUNTY

Lake of the Woods County Auditor

John W. Hoscheid
206 8th Ave SE
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Baudette, MN 56623

August 26, 2011

Federal Communications Commission
Washington, DC 20554

RE: Request for Reconsideration, MM Docket No. 03-185

We understand that a Report and Order dated July 15, 2011 in MB docket No. 03-185 establishes a drop-dead date for any TV translator still operating on any channel in the 52 to 59 range.

We are part of a multi-county TV translator system that provides free over-the-air television in Lake of the Woods, Roseau, and Koochiching Counties. All of our translators are in close proximity to the Canadian border and any application involving a channel change must be referred to and clear Canada. If the Canadian government objects to an application, it is summarily dismissed by the FCC. Which seems to take an unreasonable amount of time.

Our engineering consultant tells us that there is no systematic way for us near the border to pick a channel with assurance that it will be acceptable to Canada. The Canadian officials have never told the US engineering community what criterion they use in making their decisions.

Our translators in Lake of the Woods County operate in the 52 to 69 range. We applied for six CORE displacement channels in March 2010, but have only recently received two displacement CORE CP's. Of the remaining four applications filed in March 2010, two have recently been dismissed and two are still pending. Working with a well-established engineering consultant, we filed two displacement applications to move into the core and change to digital:

BDISDTT-20100326ACN to change K57AR to channel 29 (digital)
and
BDISDTT-20100326ACM to change K55BH to channel 27 (digital)

- EQUAL OPPORTUNITY EMPLOYER -

These recently dismissed applications were filed with the FCC in March of 2010. On August 01, 2011, 17 months later, we were notified by the FCC that Canada had object to these applications and they were accordingly dismissed.

We are going to try again but it will likely be a year or more before we know if we have been successful and these are just two examples of many that we could give.

Please consider that our climate up here in northern Minnesota makes it difficult, and for considerable periods of time during the winter, impossible to change out antennas and work with coax on high towers after about the middle of November. Let alone, the lead time to get antennas custom built and delivered to us (usually more than 2 months).

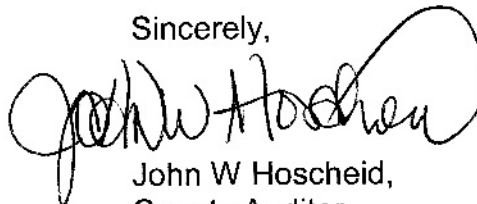
Also, our system hops from one site to another and for economic reasons we use site antennas that are combined (group 3 channels into one antenna SL8-3).

If you don't give us some relief from the mandatory shut off date of December 31, 2011 the residents of these counties will be deprived of over-the-air TV for who knows how long. We understand there is a mechanism in place to clear the occasional channel when an auction winner notifies us that they are ready to use a channel they have purchased at an auction and that a mandatory universal shut down of channels 52 to 69 is nothing more than a slight convenience to them.

Many of our county residents (viewers) use the TV translators as their only way to be notified of local emergencies.

Please find a way to help us and other translator licensees in similar circumstances.

Sincerely,

A handwritten signature in black ink, appearing to read "John W. Hoscheid", with a large, stylized loop at the end.

John W Hoscheid,
County Auditor

JWH/ih